

WMN:BSK
F. #2011R00958/OCDEF #NYNYE638

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

LUIS FERNANDO OTALVARO OROSCO,
also known as "Baldor"
and "Matematico,"

Defendant.

Cr. No. _____
(T. 21, U.S.C., §§ 853(a),
853(p), 959(c),
960(b)(1)(B)(ii) and
963; T. 18, U.S.C., §§
3238 and 3551 et seq.)

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THE GRAND JURY CHARGES:

INTERNATIONAL COCAINE DISTRIBUTION CONSPIRACY

1. On or about and between January 1, 1998 and December 31, 2009, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant LUIS FERNANDO OTALVARO OROSCO, also known as "Baldor" and "Matematico," together with others, did knowingly and intentionally conspire to distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 959(a) and 960(a)(3).

(Title 21, United States Code, Sections 963, 959(c) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3238 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and/or any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

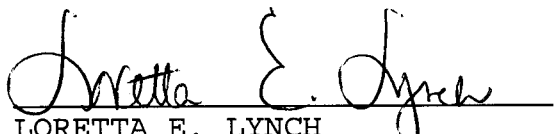
(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United

States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL .


FOREPERSON
LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

Criminal Division

THE UNITED STATES OF AMERICA

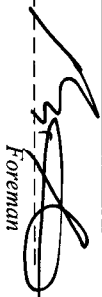
vs.

Luis Fernanda Otalvaro Oroscio,
also known as "Baldor" and "Matematico",
Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 853(a), 853(p), 959(c),
960(b)(1)(B)(ii) and 963; T. 18, U.S.C., §§
328 and 3551 et seq.)

A true bill.


Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

USA Bonnie Klapper, (718) 254-6426